

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
CARMELO VALDEZ ROMERO,  
Defendant.

CASE NO. 20-CR-4051  
  
MOTION TO WITHDRAW AS  
COUNSEL

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COMES NOW Nathan Lab, attorney of record for Defendant Carmelo Romero, and moves this Honorable Court for an Order allowing him to withdraw as counsel for Defendant for the reason that Defense Counsel has discovered a conflict of interest in further representation of the Defendant. In support of this Motion, Counsel states as follows:

1. Counsel was appointed to represent the Defendant on August 11, 2021;
2. Counsel has been provided discovery and upon initial review of the discovery, it has become apparent that continued representation of Mr. Romero would pose a conflict of interest;
3. Defendant is currently scheduled on the rotating trial docket for October 18, 2021 and the deadline to file pretrial motions is scheduled for September 8, 2021. There have been no prior requests for continuance in this matter;

WHEREFORE, Nathan Lab respectfully requests this Honorable Court for an Order allowing him to withdraw as counsel for Defendant and that new counsel be appointed.

Dated this 27<sup>th</sup> day of August 2021.

CARMELO VALDEZ ROMERO,  
Defendant,

BY: /s/Nathan Lab

Nathan S. Lab, #27457

Lab Law Firm, LLC

7701 Pacific St, ste 12

Omaha, NE 68114

(402) 940-2981

[nlab@lablawfirmllc.com](mailto:nlab@lablawfirmllc.com)

### CERTIFICATE OF SERVICE

I certify that on August 27, 2021, I electronically filed the foregoing document(s) with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Mr. Shawn Wehde  
Assistant United States Attorney  
600 4th Street, Suite 670  
Sioux City, IA 51101  
[Shawn.wehde@usdoj.gov](mailto:Shawn.wehde@usdoj.gov)

I further certify that on August 27, 2021, I sent a copy of the foregoing document, via United States Postal Service, regular mail, to the following:

Mr. Carmelo Valdez Romero  
O'Brien County Jail  
PO Box 260  
240 1<sup>st</sup> Street NE  
Primghar, IA 51245

/s/Nathan Lab  
For the Firm